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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

THOMAS RONALD HOOVER,

Defendant.

Case No.: 2:20-cr-00273-JCM-BNW

**Stipulation for Extension of Time
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, United States Attorney, and Andrew W. Duncan, Assistant United States Attorney, counsel for the United States of America, and Katherine Tanaka, Assistant Federal Public Defender, counsel for Defendant Thomas Ronald Hoover, that the date for the Government to file a response to the Defendant's Motion to Suppress (ECF No. 54) be extended for fourteen days, specifically to **February 28, 2022**.

This stipulation is entered for the following reasons:

1. The Defendant's Motion to Suppress was filed and served on January 31, 2022.
See ECF No. 54. The Government's response deadline is presently February 14, 2022.
2. Counsel for the Government was recently assigned to handle the case due to the departure from the office of original Government counsel.
3. Government Counsel needs additional time to conduct investigation and research to adequately respond to the Defendant's motion.
4. The additional time requested herein is not sought for purposes of delay, but to allow counsel for the Government time to adequately respond to the Defendant's motion.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
6. This is the first stipulation filed herein to continue the Government's response deadline.
7. The parties agree to the extension of time.

DATED: February 9, 2022

Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Andrew W. Duncan

ANDREW W. DUNCAN
Assistant United States Attorney

/s/ Katherine Tanaka

KATHERINE TANAKA
Counsel for Defendant
Thomas Ronald Hoover

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:20-cr-00273-JCM-BNW
)	
Plaintiff,)	
)	
v.)	
)	
THOMAS RONALD HOOVER,)	
)	
Defendant.)	
_____)	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Defendant's Motion to Suppress was filed and served on January 31, 2022. *See* ECF No. 54. The Government's response deadline is February 14, 2022.
2. Counsel for the Government needs additional time to conduct investigation and research to adequately respond to the Defendant's motion.
3. The additional time requested herein is not sought for purposes of delay, but to allow counsel for the Government time to adequately respond to the Defendant's motion.
4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

